

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SUZANNE BERISH, <i>et al.</i>,	:	No. _____
	:	
Plaintiffs,	:	(Electronically filed)
	:	
<i>vs.</i>	:	
	:	
SOUTHWESTERN ENERGY PRODUCTION COMPANY and SOUTHWESTERN ENERGY COMPANY,	:	
	:	
	:	
Defendants.	:	

NOTICE OF REMOVAL

Defendants Southwestern Energy Production Company (“SEPCO”) and Southwestern Energy Company (“SW”) hereby remove this case to this Court from the Court of Common Pleas of Susquehanna County, Pennsylvania.

1. Plaintiffs filed their complaint on September 14, 2010. A copy of the complaint is attached at Tab “A.”

2. Plaintiffs assert statutory and common-law claims against both defendants.

3. From the face of the complaint, it is evident that the amount in controversy exceeds the sum or substance of \$75,000 without regard to fees or costs.

4. According to their complaint, all plaintiffs are citizens of Pennsylvania.

5. Neither SEPCO nor SW is incorporated in Pennsylvania or has a principal place of business in Pennsylvania.

6. Therefore, this Court has subject-matter jurisdiction pursuant to 28 U.S.C § 1332(a), and this Court could have exercised original jurisdiction over this matter.

THEREFORE, Defendants Southwestern Energy Production Company and Southwestern Energy Company remove this case from the Court of Common Pleas of Susquehanna County to this Court.

Respectfully submitted,
K&L GATES LLP

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*Counsel for Southwestern Energy
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September 22, 2010

CERTIFICATE OF SERVICE

I certify that I served a copy of the attached document on the following by U.S. Mail, postage-prepaid, on September 23, 2010:

Michael Gleeson, Esq.
413 Deer Run Drive
Archbald, PA 18403

/s/ David R. Fine